

### Remarks

In the Office Action mailed October 4, 2004:

1. Claims 8-13 were rejected under 35 U.S.C. § 112 ¶ 2 for being indefinite;
2. Claims 1-2, 4-5, 8-9 and 11-18 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,498,731 (Roscoe);
3. Claims 3, 10 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Roscoe, in view of U.S. Patent No. 6,570,770 (Ross); and
4. Claims 6-7 were objected to, but would be allowable if rewritten in independent form.

#### I. Rejections under 35 U.S.C. § 112 ¶ 2

Claim 8 was amended to more particularly point out and distinctly claim the subject matter regarded as the invention.

#### II. Roscoe (U.S. Patent No. 6,498,731)

Roscoe is directed to a “System for Protecting Electronic Components” (title). As the title emphasizes, Roscoe provides an apparatus for *protecting* electronic components on printed circuit boards. As explained below, the subject matter of Roscoe differs from the present application; therefore, Roscoe cannot anticipate Applicants’ invention.

##### **A. Roscoe’s Assembly Does Not Include a Tab Extending from a Base**

Roscoe provides a protective assembly for an electronic component on a printed circuit board. The assembly prevents the electronic component or printed circuit board from incurring damage from hitting a planar surface (column 1, line 66 to column 2, line 7).

As shown in FIG. 4, the primary components of the apparatus are base 202 and rollbar 204. Rollbar 204 pivots within holes 236 of the base. In FIGs. 5-7, motherboard 218 is slid into guides 246 of the rollbar, which then pivots downward to place the motherboard 218 parallel to base 202. The motherboard is then secured in place against lip 238 using screws 242.

In a claimed embodiment of Applicants’ invention (e.g., claim 1), illustrated in FIGs. 2A, 2B and 3, stabilizer 110 stabilizes card cage 104 within a card cage enclosure while an expansion card is added to or removed from the card cage. The stabilizer includes a base, from which

extends tab 112 for engaging the card cage.

The Examiner has equated Roscoe's rollbar 204 with Applicants' stabilizer base. However, this comparison causes the remainder of the rejection of claim 1 to fail. In particular, claim 1 recites "a tab extending from said base..." The Examiner equated Roscoe's lip 238 with Applicants' tab, but lip 238 is not attached to and does not extend from, rollbar 204. Instead, lip 238 is part of base 202. Because Roscoe does not include "a tab extending from said base...", Roscoe cannot anticipate claim 1.

### **B. Roscoe's Assembly is More than One Rack Unit Tall**

In one or more embodiments of Applicants' invention (e.g., claim 14), an enclosure for expansion cards is no more than one rack unit in height. As described in the specification, a rack unit is approximately 1.75 inches (page 1, line 26).

The Examiner asserts that FIG. 3 of Roscoe anticipates an enclosure for expansion cards that is no more than one rack unit in height. It is inconceivable that the height of chassis 248 is no greater than one rack unit. First, Roscoe makes no mention of dimensions when describing either the protective assembly or a server chassis in which the assembly may be employed. Second, FIG. 3 clearly shows the protective assembly being inserted sideways, such that edge connectors 216 are aligned vertically, and (as shown in FIG. 2) the edge connectors receive printed circuit boards 210 in a length-wise manner. Therefore, the height of the sideways-oriented protective assembly as it is installed in chassis 248 is **far** greater than one rack unit and thus the chassis must be at least as tall as a printed circuit board is long.

If, on the other hand, the Examiner asserts that assembly 200 (not chassis 248) equates to Applicants' "enclosure," even though no portions of Roscoe were cited against the preamble or any element of claim 14, then the height of the assembly is portrayed in the vertical direction in FIG. 2. This height is at least equal to the width of a printed circuit board – again, more than one rack unit.

## **III. Selected Claims**

### **A. Claims 1-7**

Claim 1 claims a stabilizer having a base and a tab extending from the base. As described above in Section II.A, Roscoe does not include such a tab.

Further, claim 5 specifies that the tab “defines a slot between said base and said tab.” In Roscoe, lip 238 may define a slot between lip 238 and base 202, but the Examiner has equated rollbar 204 with Applicant’s base, and therefore Roscoe cannot anticipate claim 5.

**B. Claims 8-13**

Claim 8 was amended to make it clearer that the stabilizer is separate from the removable cage when the expansion cards are in operation. In Roscoe, rollbar 204 (which was equated with Applicants’ stabilizer) must remain attached to motherboard 218 (which was equated with Applicants’ removable cage) during operation of the expansion cards.

Claim 11 specifies that a tab extends from the stabilizer, wherein the tab facilitates stabilization of the removable card cage between the tab and a first surface of the stabilizer. As described above in Section II.A, Roscoe does not provide a stabilizing apparatus having a tab extending from a base. And, because Roscoe’s rollbar 204 is separate from base 202 (which includes lip 238), Roscoe’s rollbar does not comprise “a tab extending from first surface of the stabilizer, wherein said tab is configured to facilitate stabilization of said removable cage between said tab and said first surface.”

Claim 20 was added to depend from claim 8, and comprises the objected-to subject matter of claim 6.

**C. Claims 14-19**

No portion(s) of Roscoe were cited against the preamble or any limitations of claim 14. As described above in Section II.B, the perfunctory rejection of claim 14 based on Roscoe’s FIG. 3 fails. In particular, printed circuit boards in Roscoe are aligned with their planes perpendicular to the protective assembly and to the computer chassis in which the assembly is installed. Therefore, neither the assembly nor the computer chassis can be limited to one rack unit in height.

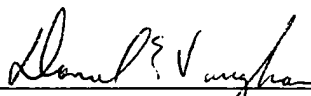
**CONCLUSION**

No new matter has been added with the preceding amendments. It is submitted that the application is in suitable condition for allowance. Such action is respectfully requested. If prosecution of this application may be facilitated through a telephone interview, the Examiner is

invited to contact Applicant's attorney identified below.

Respectfully submitted,

Date: December 3, 2004

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